

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

REBECCA LYNN TURNER,	)	
Administrator for the Estate of	)	
CONNIE SUE WOMACK STEVER,	)	
	)	
Plaintiff,	)	
	)	Case No.: 5-15-cv-00081-MFU
v.	)	
	)	
SYFAN LOGISTICS, INC.	)	
	)	
Defendant.	)	

**DEFENDANT SYFAN LOGISTICS, INC.'S MOTION  
TO DISMISS FOR LACK OF PERSONAL JURISDICTION  
UNDER FED. R. CIV. P. 12(b)(2) *FORUM NON CONVENIENS* AND  
FOR FAILURE TO STATE A CLAIM UNDER FED. R. CIV. P. 12(b)(6).**

COMES NOW, Defendant, Syfan Logistics, Inc. and moves this Court to dismiss the Plaintiff Rebecca Lynn Turner Administrator for the Estate of Connie Sue Womack Stever's Complaint For Lack of Personal Jurisdiction Under Fed. R. Civ. P. 12(b)(2); *Forum Non Conveniens* and for Failure to State a claim under Fed. R. Civ. P. 12(b)(6) Defendant Syfan Logistics, Inc. shall rely upon the memorandum of law and the attached proposed order filed contemporaneously herewith. Oral argument is respectfully requested. Syfan Logistics, Inc. will set a date for this matter to be heard within 60 days from date of filing pursuant to Local Rule 11(b).

Respectfully submitted,

/s/ John T. Husk

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*Counsel for Syfan Logistics, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on the 22nd day of December, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send a notification of such filing (NEF) to the following counsel record:

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/s/ John T. Husk

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